

**LABATON SUCHAROW LLP**  
Thomas A. Dubbs (*pro hac vice*)  
Carol C. Villegas (*pro hac vice*)  
Michael P. Canty (*pro hac vice*)  
Thomas G. Hoffman, Jr. (*pro hac vice*)  
140 Broadway  
New York, New York 10005

**LOWENSTEIN SANDLER LLP**  
Michael S. Etkin (*pro hac vice*)  
Andrew Behlmann (*pro hac vice*)  
Scott Cargill  
Colleen Restel  
One Lowenstein Drive  
Roseland, New Jersey 07068

*Lead Counsel to Securities Lead Plaintiff and the Class*

*Special Bankruptcy Counsel to Securities Lead Plaintiff and the Class*

**MICHELSON LAW GROUP**  
Randy Michelson (SBN 114095)  
220 Montgomery Street, Suite 2100  
San Francisco, California 94104

(*additional counsel on Exhibit A*)

*Local Bankruptcy Counsel to Securities Lead Plaintiff and the Class*

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Reorganized Debtors.

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric Company

☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Case No. 19-30088 (DM) (Lead Case)  
Chapter 11  
(Jointly Administered)

**SECURITIES PLAINTIFFS' PRE-HEARING STATEMENT**

Date: November 7, 2023

Time: 10:00 a.m. (PT)

Before: (Telephonic Appearances Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, California 94102

Lead Plaintiff Public Employees Retirement Association of New Mexico (“PERA”) hereby submits this pre-hearing statement for the November 7, 2023 hearing before the Court, in response to the Court’s request for a “check-in” regarding PERA’s anticipated motion to withdraw the reference with respect to any motion to dismiss the claims alleged in PERA’s class complaint. October 17, 2023 H’ring Tr. at 47:12.

The Court's Order Authorizing Amendment and Objection Procedures for Securities Claimants provides that Reorganized Debtors must move to dismiss PERA's class complaint by December 13, 2023. *See* ECF No. 13934-1); *see also* ECF No. 14070 at 7 (Reorganized Debtors state they intend to challenge all 19 misstatements alleged in PERA's class complaint for failure to plead falsity and scienter).

For the reasons set forth in detail in PERA's October 16, 2023 submission to the Court (ECF No. 14047), PERA intends to move for withdrawal of the reference with respect to Reorganized Debtors' motion to dismiss (*see* 28 U.S.C. § 157(d)). Reorganized Debtors will have to speak for themselves, but it is PERA's understanding that they currently intend to oppose that motion.

Dated: November 3, 2023

Respectfully submitted,

**LABATON SUCHAROW LLP**

By: /s/ Thomas A. Dubbs  
 Thomas A. Dubbs (*pro hac vice*)  
 Lead Counsel to Securities Lead  
 Plaintiff and the Class

- and -

**MICHELSON LAW GROUP**

*Local Bankruptcy Counsel to Securities Lead Plaintiff and the Class*

- and -

**LOWENSTEIN SANDLER LLP**

*Special Bankruptcy Counsel to Securities Lead Plaintiff and the Class*

1 - and -

2 **WAGSTAFFE, VON LOEWENFELDT, BUSCH**  
3 **& RADWICK, LLP**

4 *Liaison Counsel for the Class*

5 - and -

6 **ROBBINS GELLER RUDMAN & DOWD LLP**  
7 *Counsel for the Securities Act Plaintiffs*

8 - and -

9 **VANOVERBEKE, MICHAUD & TIMMONY,**  
10 **P.C.**

11 *Additional Counsel for the Securities Act Plaintiffs*

**EXHIBIT A**  
**COUNSEL**

**LABATON SUCHAROW LLP**

Thomas A. Dubbs (*pro hac vice*)  
Carol C. Villegas (*pro hac vice*)  
Michael P. Canty (*pro hac vice*)  
Thomas G. Hoffman, Jr. (*pro hac vice*)  
140 Broadway  
New York, New York 10005  
Telephone 212-907-0700  
tdubbs@labaton.com  
cvillegas@labaton.com  
mcanty@labaton.com  
thoffman@labaton.com

*Lead Counsel to Securities Lead Plaintiff and  
the Class*

**LOWENSTEIN SANDLER LLP**

Michael S. Etkin (*pro hac vice*)  
Andrew Behlmann (*pro hac vice*)  
Scott Cargill  
Colleen Restel  
One Lowenstein Drive  
Roseland, New Jersey 07068  
Telephone 973-597-2500  
Facsimile 973-597-2333  
metkin@lowenstein.com  
abehlmann@lowenstein.com  
scargill@lowenstein.com  
crestel@lowenstein.com

*Special Bankruptcy Counsel to Securities  
Lead Plaintiff and the Class*

**ROBBINS GELLER RUDMAN & DOWD  
LLP**

Darren J. Robbins (SBN 168593)  
Brian E. Cochran (SBN 286202)  
655 West Broadway, Suite 1900  
San Diego, California 92101  
Telephone 619-231-1058  
darrenr@rgrdlaw.com  
bcochran@rgrdlaw.com

**VANOVERBEKE, MICHAUD &  
TIMMONY, P.C.**

Thomas C. Michaud  
79 Alfred Street  
Detroit, Michigan 48201  
Telephone 313-578-1200  
tmichaud@vmtlaw.com

*Counsel for the Securities Act Claims*

**WAGSTAFFE, VON LOEWENFELDT,  
BUSCH & RADWICK, LLP**

James M. Wagstaffe (SBN 95535)  
Frank Busch (SBN 258288)  
100 Pine Street, Suite 725  
San Francisco, California 94111  
Telephone 415-357-8900  
wagstaffe@wvbrlaw.com  
busch@wvbrlaw.com

*Liaison Counsel for the Class*

**MICHELSON LAW GROUP**

Randy Michelson, Esq. (SBN 114095)  
220 Montgomery Street, Suite 2100  
San Francisco, CA 94104  
Telephone 415-512-8600  
Facsimile 415-512-8601  
randy.michelson@michelsonlawgroup.com

*Local Bankruptcy Counsel to Securities Lead  
Plaintiff and the Class*

**ROBBINS GELLER RUDMAN & DOWD  
LLP**

Willow E. Radcliffe (SBN 200089)  
Kenneth J. Black (SBN 291871)  
Hadiya K. Deshmukh (SBN 328118)  
Post Montgomery Center  
One Montgomery Street, Suite 1800  
San Francisco, California 94104  
Telephone 415-288-4545  
willowr@rgrdlaw.com  
kennyb@rgrdlaw.com  
hdeshmukh@rgrdlaw.com